

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

INSURANCE COMPANY OF GREATER)
NEW YORK, as subrogee of Chelsea Crossing of)
Southfield Condominium Association,) Case No. 22-cv-11030
)
Plaintiff,)
)
v.)
) David M. Lawson
DEANNA JOHNSON, a Michigan resident,)
)
Defendant.)

RESPONSE TO ORDER TO SHOW CAUSE

NOW COMES the Plaintiff, INSURANCE COMPANY OF GREATER NEW YORK, as subrogee of Chelsea Crossing of Southfield Condominium Association, by and through its attorneys, Foran Glennon Palandech Ponzi & Rudloff PC, and for its Response to this Court's Order To Show Cause, pursuant to E.D. Mich. LR 41.2, states as follows:

1. After repeated attempts to serve Defendant Deanna Johnson, Plaintiff, with leave of court, served the defendant via Certified Mail on October 1, 2022; via substitute service on October 6, 2022; and via email on October 26, 2022. (Dkt. No.10).
2. On October 28, 2022, Defendant Deanna Johnson called Plaintiff's counsel's partner, George M. Ferretti, and advised that she would be retaining counsel to represent her in this case. She claimed that prior to receiving counsel's email attaching a copy of the summons and complaint on October 26, 2022, she had not received notice of this lawsuit.
3. Defendant Johnson has not filed an Appearance or Answer in this case.
4. Plaintiff filed a Request for Clerk's Entry of Default on December 2, 2022 (Dkt. No. 12). Upon entry of Default, Plaintiff will file a Request for Judgment by Default forthwith.

WHEREFORE, Plaintiff, GREATER NEW YORK MUTUAL INSURANCE COMPANY, subrogee of Chelsea Crossing of Southfield Condominium Association, respectively requests that this Court refrain from dismissing its action.

Dated this 2nd day of December, 2022.

Respectfully Submitted,

/s/ Brian E. Devilling

Brian E. Devilling (Bar No. 6277371)
Foran Glennon Palandech Ponzi & Rudloff PC
222 North LaSalle Street, Suite 1400
Chicago, IL 60606
Phone: (312) 863-5000
Fax: (312) 863-5099
e-mail: bdevilling@fgppr.com

Attorneys for Plaintiff INSURANCE
COMPANY OF GREATER NEW YORK, as
subrogee of Chelsea Crossing of Southfield
Condominium Association